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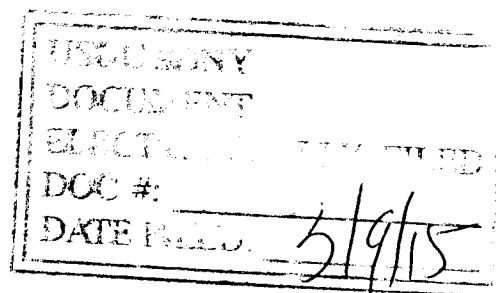
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March 6, 2015

VIA EMAIL

Hon. Jed. S. Rakoff
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED



Re: United States v. Michael Materasso, 06 Cr. 150 (JSR)

Dear Judge Rakoff:

The defense respectfully requests that the sealed *Motions In Limine* filings-- the Motion for Admission of Witness Statements and Motion for Admission of Prior Bad Act Evidence--in the most recent supervised release violation proceeding be unsealed so that the defense can disclose these papers to the Manhattan District Attorney's Office and in filings with the New York State Court in the state case styled *State v. Materasso*, 2014 NY085219.¹

The Government consents to this request.

Respectfully submitted,

Rita M. Glavin

cc: Andrew Beaty (AUSA)
Daniel Tehrani (AUSA)

50 ORDERED

USDS 3-6-15

¹ In the State's case, Mr. Materasso is charged with the *very same conduct* that was at issue in the supervised release hearing. The Manhattan DA's Office charged Michael Materasso with several crimes in connection with three alleged domestic violence incidents: (1) the November 5, 2013 incident (Supervised Release Specifications 1 and 2); 2) the November 7/8, 2013 incident (Supervised Release Specification 3); and (3) an alleged strangulation incident in June 2013 (this was the incident that formed the basis for the Government's Rule 404(b) notice, and the incident that Mrs. Materasso emailed her FBI handler about with a photograph of her injuries).